DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

Reference Numbers: 95-0606 and 95-0628

David S. Mantus, Ph.D.
Director, Regulatory Affairs
BioChem Pharma Inc.
2323 Parc Technologique Blvd.
Sainte-Foy (Quebec)
Canada G1P 4R8

MAR - 9 2000

Dear Dr. Mantus:

Your biologics license application for BCG, Live (for intravesical use), "PACIS," for the treatment of carcinoma-in-situ (CIS) in the absence of associated invasive cancer of the bladder, is approved this date. This letter hereby issues U.S. License No. 1283 to BioChem Pharma Inc., Sainte-Foy, Quebec, Canada, in accordance with the provisions of Section 351(a) of the Public Health Service Act. This license authorizes you to introduce or deliver for introduction into interstate commerce, those products for which your company has demonstrated compliance with the establishment and product standards. BioChem Pharma Inc. is hereby authorized to introduce or deliver for introduction into interstate commerce, BCG, Live produced at your Laval, Quebec, Canada location under U.S. License No. 1283.

We acknowledge your commitment dated February 25, 2000, stating that ——— lots of BCG Live released to the U.S. that exceed a moisture level of ——— but less than or equal to ——— at time of release will be placed on a stability program which monitors viability, moisture content and sterility for up to the 12 month expiry date. Additional lots with moisture level of ——— but less than or equal to ——— may need to be placed on a stability program depending on the results obtained with the first ——— lots. We recommend that the data obtained regarding moisture and viability obtained from the stability program be used to establish specifications for moisture over the shelf-life of the product. Under this approval, the dating period for this product, as supplied in ampoules, shall be 12 months from the date of the last valid potency test when stored at 2-8°C. Any extension of the dating period will require the submission of supporting data as a supplement to your biologics license application for review and approval. Alternatively, you may

submit a stability protocol to be used in extension of dating as a supplement to your license application.

You are requested to submit to the Center for Biologics Evaluation and Research (CBER) samples of each future lot of product in final containers together with protocols showing the results of all applicable tests. No lots of product shall be distributed until notification of release is received from the Director, CBER.

This information will be placed in your biologics license application file for this product.

Changes to the manufacturing process, manufacturing facility, product testing, packaging, or labeling for BCG, Live may require submission of a supplement to your biologics license application for our review and written approval prior to implementation.

It is requested that adverse experience reports for BCG, Live be submitted in accordance with the adverse experience reporting requirements for licensed biological products (21 CFR 600.80) and that distribution reports be submitted as described (21 CFR 600.81). These reports should be submitted to MEDWATCH.

Please submit three copies of final printed labeling at the time of use and include part II of the label transmittal form with completed implementation information. In addition, please submit three copies of the introductory advertising and promotional labeling. You may wish to submit the proposed material in draft form with part I of FDA form 2567 to the Center for Biologics Evaluation and Research, Advertising and Promotional Labeling Staff, HFM-602, 1401 Rockville Pike, Rockville MD 20852-1448. Two copies of final advertising and promotional materials should be submitted at the time of use with Part II of FDA Form 2567 to the Advertising and Promotional Labeling Staff. Please include copies of the approved labeling (package insert) with your advertising and promotional materials. Promotional claims should not be contrary to approved labeling. No comparative claims or claims of superiority over other similar products should be made unless data to support such claims are submitted to and approved by CBER.

Please acknowledge receipt of this letter to the Director, Division of Vaccines and Related Products Applications, HFM-475, Center for Biologics Evaluation and Research.

Sincerely yours,

William Egan, Ph.D.
Acting Director
Office of Vaccines
Research and Review
Center for Biologics
Evaluation and Research

Steven A. Masiello
Director
Office of Compliance and
Biologics Quality
Center for Biologics
Evaluation and Research